

1 District Judge Jamal N. Whitehead
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

9 HERIBERTO SANCHEZ ACOSTA,
10
11 Plaintiff,

v.

12 UR MENDOZA JADDOU, *et al.*,
13
14 Defendants.

Case No. 3:24-cv-05584-JNW

STIPULATED MOTION TO HOLD
CASE IN ABEYANCE AND
[PROPOSED] ORDER

Noted for Consideration:
September 24, 2024

15 Plaintiff and Defendants, by and through their counsel of record, pursuant to Federal Rule
16 of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to
17 stay these proceedings until January 27, 2025. Plaintiff brings this litigation pursuant to the
18 Administrative Procedure Act and Mandamus Act seeking, *inter alia*, to compel the U.S.
19 Citizenship and Immigration Services (“USCIS”) to compel action on his Form I-918,
20 Application for U Nonimmigrant Status, and Form I-765, Application for Employment
21 Authorization. For good cause, the parties request that the Court hold this case in abeyance until
22 January 27, 2025.

23 Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706
24 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to

1 control the disposition of the causes on its docket with economy of time and effort for itself, for
2 counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ.
3 P. 1.

4 With additional time, this case may be resolved without the need of further judicial
5 intervention. USCIS has issued a Request for Evidence (“RFE”) to Plaintiff concerning the
6 applications. Plaintiff has until December 19, 2024, to respond to the RFE. USCIS must receive
7 and review this response before continuing with the processing of his applications. Accordingly,
8 the parties respectfully request that the instant action be stayed until January 27, 2025. The parties
9 will submit a joint status report on or before January 27, 2025.

10 DATED this 24th day of September, 2024.

11 Respectfully submitted,

12 TESSA M. GORMAN

RICH IMMIGRATION PC

13 TESSA M. GORMAN
United States Attorney

s/ Katherine H. Rich

14 *s/ Michelle R. Lambert*
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21 Attorneys for Defendants

22 ***I certify that this memorandum contains 252
words, in compliance with the Local Civil
Rules.***

24 STIPULATED MOTION
[Case No. 3:24-cv-05584-JNW] - 2

UNITED STATES ATTORNEY
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1
2 **[PROPOSED] ORDER**
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4 The stipulated motion, Dkt. No. 6, is GRANTED. This case is held in abeyance until
5 January 27, 2025. The parties shall submit a joint status report on or before January 27, 2025.
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7 It is so **ORDERED**.
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9 DATED this 25th day of September, 2024.
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13 JAMAL N. WHITEHEAD
14 United States District Judge
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